

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

State Farm Mutual Automobile Insurance Company and)	
State Farm Fire and Casualty Company,)	
)	
Plaintiffs,)	Case No. 1:17-cv-5845
)	
v.)	Hon. Margo K. Brodie
)	
)	Magistrate Judge
)	Vera M. Scanlon
21st Century Pharmacy Inc.,)	
Albert Alishayev,)	
Iris Itskhakov a/k/a Istam Itskhakov,)	
Peter Khaim a/k/a Peter Khaimov a/k/a Petr Khaimov,)	
Tariel Begiyev,)	
Express Billing & Collection Inc,)	
Anturio Marketing, Inc.,)	
Logic Consulting, Inc.,)	
P&K Marketing Services Inc,)	
A&P Holding Group Corp,)	
New Business Resources Group Inc,)	
K&L Consultants Inc,)	
New Business Funding Inc,)	
TBM Solution Inc,)	
TAR Group Inc,)	
Personal Tech Inc,)	
Timothy Morley, D.O.,)	
Azu A. Ajudua, M.D.,)	
Vincentiu Popa, M.D., and)	
Jo-Ann Shakarjian, M.D.,)	
)	
Defendants.)	

PLAINTIFFS' NOTICE OF MOTION FOR DEFAULT JUDGMENT

PLEASE TAKE NOTICE that Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (together, "Plaintiffs"), pursuant to Federal Rule of Civil Procedure 55(b)(2) and Local Civil Rule 55.2, will move this Court for an entry of default judgment against the defendants who have failed to answer or otherwise respond

to the Amended Complaint [Dkt. 132, 133] in this case — Tariel Begiyev, New Business Funding Inc, TBM Solution Inc, TAR Group Inc, Personal Tech Inc, Timothy Morley, D.O., and Jo-Ann Shakarjian, M.D (collectively, the “Defaulting Defendants”).

WHEREFORE, for all of the reasons stated in the accompanying brief, Plaintiffs will move this Court pursuant to Fed. R. Civ. P. 55(b)(2) for entry of a default judgment against (1) Morley as to the Fourth, Fifth, Sixth, Sixteenth, and Seventeenth Claims for Relief; (2) Shakarjian as to the Tenth, Eleventh, Twelfth, Sixteenth, and Seventeenth Claims for Relief; (3) Begiyev as to the First through Fifteenth Claims for Relief; and (4) New Business Funding, TAR Group, TBM Solution, and Personal Tech as to the Second Claim for Relief.

Dated: October 30, 2019

Respectfully submitted,

By: /s/ Jonathan L. Marks
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